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Attorneys for Plaintiff  
UNITED STATES OF AMERICA

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

SEP 27 2002  
at 2 o'clock and 0 min. P.M.  
WALTER A. Y. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CR. NO. CR02-00398	DAE
	)		
Plaintiff,	)		
	)		
v.	)	INFORMATION	
	)	[21 U.S.C. §§ 952 and 963]	
	)		
ANDREW GORMAN BOTTS,	)		
	)		
Defendant,	)		
_____	)		

INFORMATION

The United States Attorney charges that:

From a time unknown up through and including May 7, 2002, in the District of Hawaii and elsewhere, Defendant ANDREW GORMAN BOTTS and others known and unknown knowingly and intentionally conspired to import into the United States from a place outside thereof, 100 grams or more of a mixture or substance containing a detectable amount of heroin, approximately

SCANNED

156.7 grams, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 952(a).

Overt Acts

In furtherance of this conspiracy and in order to attain the objects thereof, the following overt acts, among others, were committed in the District of Hawaii and elsewhere:

1. In or around April, 2002, Defendant ANDREW GORMAN BOTTS agreed to send an individual residing in Hawaii a quantity of heroin from Thailand to a rental storage facility called Discount Storage located at 868 Queen Street.

2. On or about April 22, 2002, Defendant ANDREW GORMAN BOTTS traveled to Thailand and purchased a quantity of heroin to send to Hawaii.

3. In or around May 7, 2002, Defendant ANDREW GORMAN BOTTS placed approximately 82.7 grams of the heroin he purchased in Thailand into two pieces of magazine paper and taped the edges closed. He placed approximately 74 grams of the heroin into two other pieces of magazine paper and taped the edges closed. He then placed these quantities of heroin into two separate express mail packages and mailed it to the individual's private mail boxes registered under the two fictitious names, "Jamie Rivers" and "Kimmy Brown" located at Discount Storage, 868 Queen Street, Honolulu, Hawaii.


4. On or about May 8, 2002, Defendant ANDREW GORMAN BOTTS contacted the individual and advised him that two parcels containing quantities of heroin had been sent from Thailand to the two private mailboxes registered under the two false names, "Jamie Rivers" and "Kimmy Brown" at Discount Storage.

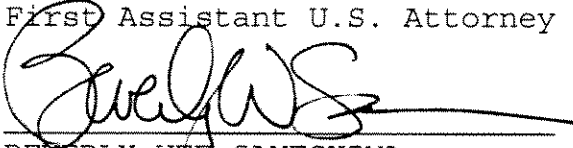
5. In or around the middle part of April, 2002, through the early part of May, 2002, Defendant ANDREW GORMAN BOTTS received approximately \$4,000 to \$5,000 in cash into his bank accounts at Bank of Hawaii and First Hawaiian Bank from the individual as payment for the shipment of heroin.

All in violation of 21 United States Code §952(a) and 21 United States Code §963.

DATED: September 27, 2002, Honolulu, Hawaii.

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United States v. Andrew Gorman Botts  
Cr. No. \_\_\_\_\_  
"Information"